

**TECHNICAL REVIEW DOCUMENT  
FOR  
SIGNIFICANT PERMIT MODIFICATION to  
OPERATING PERMIT 00OPDO225**

to be issued to:

TransColorado Gas Transmission Company  
**Dolores Compressor Station**  
Dolores County  
Source ID 0330019

Cathy Rhodes  
April, 2006

**I. Purpose**

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the minor permit modification application submitted February 22, 2006. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

**II. Source Description**

This facility is located in Dolores County, on private land surrounded by the San Juan National Forest approximately 13 miles northeast of Dolores, Colorado and 0.6 miles east of Beaver Creek. The area is classified as attainment for all pollutants. Mesa Verde National Park is a Federal Class I designated area within 100 kilometers of the plant. Utah and New Mexico are affected states within 50 miles.

The Dolores Compressor Station is a natural gas transmission facility. Natural gas is compressed for transmission to sales pipelines using reciprocating engines driving gas compressors. Electrical power is also generated on-site, for use at the station, using reciprocating engines driving generators.

Based on information provided by the applicant, the facility is not subject to the requirements of 112(r) (Accidental Release Program).

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Facility wide emissions after this modification are as follows:

<u>Pollutant</u>	<u>Potential (TPY)</u>	<u>Actual (TPY)</u>
Nitrogen Oxides (NO <sub>x</sub> )	89	66
Volatile Organic Compounds (VOC)	60	44
CO	49	155
Formaldehyde (Single HAP)	8	
Total HAPs	13	

Potential emissions are based on permitted emission limits. Actual emissions are based on the most recently submitted APENs. Note the total HAP emission limits calculated in the application are based on full operation of both S03 and S04. The permittee subsequently requested emission limits based on half of the maximum capacity (total) for the two engines. The HAP limits are therefore revised to reflect this operating mode.

## **II. Discussion of Requested Modification**

The source emits major amounts of Hazardous Air Pollutants (HAPs). The EPA promulgated Maximum Achievable Control Technology (MACT) standards for Oil and Natural Gas Production Facilities, and for Natural Gas Transmission and Storage Facilities on June 17, 1999. Facilities that do not contain affected sources (glycol dehydration units, storage vessels with the potential for flash emissions, etc.), are not subject to the MACT requirements. The Dolores Compressor Station does not contain any affected sources, and is not subject to these MACT requirements. Some engines at this facility are subject to the Reciprocating Internal Combustion Engine (RICE) MACT requirements. The permittee has applied to become a synthetic minor source for HAPs. The synthetic minor HAP request is being processed as a significant permit modification, in order to make the requested limits federally enforceable. Catalysts are being installed on units E367 (S01) and E268 (S02) in order to reduce HAP emissions. The catalysts also reduce CO emissions.

Section II, Condition 1.1 is revised to reflect the new CO emission limits for S01 and S02.

Section II, Condition 1.4 is revised to indicate catalyst monitoring now applies to all engines with catalysts.

Section II, Condition 1.6 is added to include the facility wide HAP emission limits. Compliance is monitored using emission calculations and catalyst monitoring.

Note that in accordance with the EPA's "once in always in" requirement for the MACT standards, any "new engines" at this site that were subject to the RICE MACT prior to issuance of this revised permit remain subject to the RICE MACT standards.

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#### Compliance Assurance Monitoring (CAM)

CAM applies to each unit that uses an add on control device to meet an emission limit, and for which pre-controlled emissions equal or exceed the major source thresholds (100 tons/year criteria pollutant and 10 tons/year single HAP or 25 tons/year total HAPs). S01 and S02 now use an add on control device to control CO and HAP emissions. Pre-controlled CO emissions are 69 tons/year, therefore CAM will not apply. Pre-controlled formaldehyde emissions are 10.2 tons/year, therefore CAM will apply to the HAP emission limits. The permittee is required to submit a CAM plan for "large pollutant specific emission units" at the time of initial permit application or significant permit modification. "Large pollutant specific emission units" are those with controlled emissions exceeding the threshold limits. S01 and S02 are not "large pollutant specific emission units," therefore the permittee is not required to submit a CAM plan for S01 and S02 until the next operating permit renewal. Section I, Condition 6.1 is revised accordingly.

#### Other Modifications:

The following modifications are made to reflect current Division policy and regulatory requirements.

Section I, Condition 1.4 – Delete the reference to Condition 3.g. The EPA has approved these provisions into the State Implementation Plan.

Section I, Condition 2 – Revise to incorporate latest Alternative Operating Scenario for engine replacement.

Section II, Conditions 1.1 and 1.2 – Revised to clarify that "fuel" used to estimate emissions is natural gas and "consumption" limits are the natural gas limits. Emission calculation methods to coincide with the latest periodic monitoring requirements are added.

Section II, Condition 1.3 – Revised to indicate only natural gas is used as fuel.

Section II, Condition 1.4 – Revised to incorporate most recent portable monitoring language.

Section IV – Revised to incorporate current general condition language.

Appendices B and C – Incorporate current reporting format.